

IN THE DISTRICT COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

PROGRESSIVE DIRECT INSURANCE
COMPANY., as Subrogee of C. Daly,

Plaintiff(s),

vs.

JUDY L. RUSK,

Defendant(s).

Case No. 3AN-15-764CI

COMPLAINT

COMES NOW the plaintiff(s), PROGRESSIVE DIRECT INSURANCE COMPANY., as Subrogee for C. Daly ("Progressive"), by and through its counsel of record, McNall & Associates, P.C., and for its Complaint against the defendant(s), JUDY L. RUSK, states as follows:

1. Progressive is an Ohio corporation, licensed to do business in the State of Alaska. It has paid all applicable taxes and meets all other requirements to properly bring this action.
2. Defendant, JUDY L. RUSK, at all relevant times hereto was a resident of the Third Judicial District, residing in Anchorage, Alaska.
3. On or about February 14, 2014, Plaintiffs insured was traveling North on Crest View Road in Eagle River, Alaska.

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4. At the same date and time a vehicle driven by the Defendant, JUDY L. RUSK, ran a Red light at the intersection of Crest View Road and Citation Drive and "T-Boned" Plaintiffs insured.

5. The accident was caused solely by the negligence of the defendant, JUDY L. RUSK.

6. As a direct and proximate result of defendant's negligence, there were medical, property damages and costs incurred.

7. As a direct and proximate result of the defendant's negligence, plaintiff Progressive has paid for property damages to Plaintiffs insured in the amount of \$6,777.25, deductible of \$500.00, medical claims in the amount of \$20,162.00, rental car in the amount of \$210.00 and towing in the amount of \$105.00 for a total of \$27,754.25.

8. By contract and law, Progressive Direct Insurance Company is subrogated to the rights of its insured against third parties when it pays its insured's claims resulting from the negligence of such third parties.

WHEREFORE, Plaintiff(s) respectfully request the following relief:

1. Judgment against the defendant in an amount to be proven at trial;
2. Pre and post judgment interest;
3. Costs and attorney's fee incurred in bringing this action; and
4. Additional further relief as the court deems just and equitable.

DATED this 11th day of June, 2015 at Anchorage, Alaska.

CPe

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McNall & Assoc., P.C.
Attorney for Plaintiff(s)

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